### IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

ROTHSCHILD CONNECTED DEVICES \$ INNOVATIONS, LLC \$ Plaintiff, \$ Case No: 2:15-cv-01431-JRG \$ vs. \$ LEAD CASE \$ GUARDIAN PROTECTION SERVICES, \$ INC. \$ Defendant. \$ \$ Defendant. \$ \$ Defendant.

## <u>UNOPPOSED MOTION TO DISMISS DEFENDANT</u> GUARDIAN PROTECTION SERVICES, INC. WITHOUT PREJUDICE

Pursuant to Rule 41(a) of the Federal Rules of Civil Procedure, Plaintiff Rothschild Connected Devices Innovations, LLC ("Rothschild") files this Unopposed Motion to Dismiss Defendant Guardian Protection Services, Inc. Without Prejudice.

Wherefore, Rothschild moves this Court to dismiss this action and all claims by Rothschild against Guardian Protection Services, LLC. without prejudice, with each party to bear its own costs, attorney's fees and other litigation expenses and request that the Court enter the proposed order of dismissal submitted herewith.

Dated: December 17, 2015 Respectfully submitted,

/s/ Jay Johnson

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### CERTIFICATE OF CONFERENCE

The undersigned certifies that on December 17, 2015, counsel for Plaintiff met and conferred with counsel for Defendant and that counsel for Defendant agreed to the motion.

/s/ Jay Johnson Jay Johnson

# **CERTIFICATE OF SERVICE**

The undersigned certifies that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on December 17, 2015.

/s/ Jay Johnson

Jay Johnson